

UNITED STATES DISTRICT COURT

for the

Eastern District of Michigan

United States of America

v.

Vinothkaan Selvarajah

Case No.

Case: 2:24-mj-30306

Assigned To : Unassigned

Assign. Date : 7/31/2024

Description: COMP USA V.

SELVARAJAH (KB)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of July 30, 2024 in the county of St Clair in the
Eastern District of Michigan, the defendant(s) violated:

*Code Section**Offense Description*

21 U.S.C. § 841(a)(1)

21 U.S.C. § 841(b)(1)(A)(vii)

Possession with intent to distribute controlled substances.

Possession with intent to distribute more than 5 kilograms of a mixture or substance containing a detectable amount of cocaine.

This criminal complaint is based on these facts:

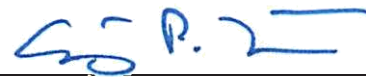
See attached affidavit.

☒ Continued on the attached sheet.

Sworn to before me and signed in my presence
and/or by reliable electronic means.

Date: July 31, 2024

City and state: Detroit, MI

*Complainant's signature*Andrew Erber, Special Agent*Printed name and title**Judge's signature*Hon. Anthony P. Patti, United States Magistrate Judge*Printed name and title*

AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT

I, Andrew Erber, being duly sworn, hereby states:

1. I am a Special Agent employed by the United States Department of Homeland Security, Homeland Security Investigations (HSI), in Detroit, Michigan. I have been a Special Agent with the Detroit Special Agent in Charge (SAC) Office since July of 2022. I previously served as a U.S. Border Patrol Agent since June of 2016. I have successfully completed the Homeland Security Investigations Special Agent Training Course at the Federal Law Enforcement Training Center in Glynco, Georgia.

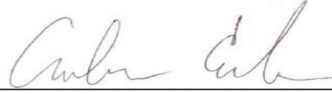
2. The following information is based upon my own knowledge and previous experiences as well as the knowledge of fellow law enforcement officers. The following affidavit contains only those facts I believe necessary to establish probable cause and does not necessarily contain all facts known at this time.

3. On July 30, 2024, at 4:14 am, St Clair County Central Dispatch (SCCCD) received a call from a concerned citizen regarding two tractor trailers who were engaged in suspected narcotics activity. The caller advised that they believed that one of the trucks was headed to the Blue Water Bridge (BWB) Port of Entry. SCCCDD relayed the identifying information of the tractor trailer to officers at the BWB. Customs and Border Protection (CBP) officers encountered the suspect vehicle (Ontario tractor plate PA 51628) at 4:27am and conducted an outbound inspection.

4. The operator and sole occupant, identified as Vinothkaan SELVARAJAH, exited the vehicle after requested by CBP officers. During an inspection of the trailer, CBP officers located four (4) black duffle bags containing bricks of suspected cocaine.

5. The duffle bags were removed from the truck and examined. A field test of the white powdery substance yielded a positive result for cocaine. A total of 56 bricks was recovered, totaling a weight of 89.15 kilograms. SELVARAJAH was taken into custody by CBP officers and secured in an interview room at the Blue Water Bridge. HSI Special Agent Andrew Erber responded to the BWB and conducted an investigative interview. After the interview, HSI placed SELVARAJAH under arrest and contacted the St. Clair Country Sheriff's Office. SELVARAJAH was transported to the St. Clair County Jail where he is lodged.

7. Based upon the aforementioned facts, I believe that there is probable cause to believe that Vinothkaan SELVARAJAH did knowingly and unlawfully possess with the intent to distribute more than 5 kilograms of a mixture or substance containing a detectable amount of Cocaine, a Schedule II controlled substance, all in violation of Title 21 USC §§ 841 (a)(1) and 841(b)(1)(A)(vii).



Andrew Erber, Special Agent
Immigration & Customs Enforcement
Homeland Security Investigations

Subscribed and sworn to before me
in person or by other reliable
means this 31st day of July 2024.



Hon. Anthony P. Patti
United States Magistrate Judge